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15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 SAN FRANCISCO DIVISION

18 UNITED STATES OF AMERICA,

19) CASE NO. 20-CR-00249 RS

20 Plaintiff,

21) MOTION TO SEAL EXHIBIT 1 [ECF NO. 732-2] &
22 v.) EXHIBIT 2 [ECF NO. 732-3] TO DECLARATION
23) OF FBI FORENSIC ACCOUNTANT THERESA
24) CHIU IN SUPPORT OF UNITED STATES'
25) PROPOSED FORFEITURE & RESTITUTION
26) ORDERS [ECF NO. 732-1] AND [PROPOSED]
27) SEALING ORDER
28)

29 ROWLAND MARCUS ANDRADE,

30 Defendant.

The United States, by and through its counsel, moves this Court for an order sealing Exhibit 1 (ECF No. 732-2) and Exhibit 2 (ECF No. 732-3) to the Declaration (ECF No. 732-1) of FBI Forensic Accountant Theresa Chiu in Support of the United States' Proposed Forfeiture and Restitution Orders. Exhibits 1 and 2 contain voluminous personal identifiable information ("PII") for victims of the crimes involved in this case, and such PII cannot reasonably be redacted.

Accordingly, the United States requests that the Court seal these two exhibits, which the United States shall lodge with the Clerk of the Court via USB thumb drive

DATED: September 8, 2025

Respectfully,

CRAIG H. MISSAKIAN
United States Attorney

/s/
CHRISTIAAN H. HIGHSMITH
Assistant United States Attorney

[PROPOSED] ORDER

Upon the motion of the United States, and good cause having been shown, IT IS HEREBY ORDERED that the United States shall file Exhibit 1 (ECF No. 732-2) and Exhibit 2 (ECF No. 732-3) to the Declaration (ECF No. 732-1) of FBI Forensic Accountant Theresa Chiu in Support of the United States' Proposed Forfeiture and Restitution Orders under seal by lodging copies of said exhibits with the Clerk of Court.

IT IS SO ORDERED.

DATED:

HON. RICHARD SEEBORG
Chief United States District Judge